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*Attorneys for Defendants*

UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**ANSWER TO PLAINTIFFS' MASTER  
LONG FORM COMPLAINT**

This Document Relates to:  
  
ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

1 Defendants Uber Technologies, Inc. (“Uber”); Rasier, LLC; and Rasier-CA, LLC (collectively,  
2 “Defendants”) answer Plaintiffs’ Master Long Form Complaint (“Complaint”) as follows:

3 Defendants deny the statements in the Preliminary Statement to the extent they are deemed  
4 allegations that require a response. Defendants generally deny liability for all claims alleged in the  
5 Complaint and deny each allegation that has not been expressly admitted below.

## 6 **RESPONSE TO “II. INTRODUCTION”**

### 7 **RESPONSE TO PARAGRAPH NO. 1:**

8 Defendants are without knowledge or information as to what the “general public” thought in 2009.  
9 Accordingly, the allegations in Paragraph 1 of the Complaint are denied.

### 10 **RESPONSE TO PARAGRAPH NO. 2:**

11 Defendants deny the allegations in Paragraph 2 of the Complaint, except to the extent that they  
12 purport to summarize the San Francisco Transportation Code, the contents of which speak for themselves.

### 13 **RESPONSE TO PARAGRAPH NO. 3:**

14 Defendants admit that UberCab, Inc. operated in San Francisco in 2010. Paragraph 3 of the  
15 Complaint also purports to quote an unidentified statement allegedly made by Uber. To the extent this  
16 statement exists, its contents speak for themselves. The allegations in Paragraph 3 are otherwise denied.

### 17 **RESPONSE TO PARAGRAPH NO. 4:**

18 Paragraph 4 of the Complaint purports to quote an unidentified statement allegedly made by Uber.  
19 To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 4 are  
20 otherwise denied.

### 21 **RESPONSE TO PARAGRAPH NO. 5:**

22 Defendants are without knowledge or information sufficient to form a belief as to the truth of the  
23 allegations in Paragraph 5 of the Complaint because they address other companies. To the extent  
24 Paragraph 5 includes allegations against Uber, they are denied.

### 25 **RESPONSE TO PARAGRAPH NO. 6:**

26 Defendants deny the allegations in Paragraph 6 of the Complaint.

### 27 **RESPONSE TO PARAGRAPH NO. 7:**

28 Defendants deny the allegations in Paragraph 7 of the Complaint..

**RESPONSE TO PARAGRAPH NO. 8:**

Defendants deny the allegations in Paragraph 8 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 9:**

Defendants deny the allegations in Paragraph 9 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 10:**

Defendants deny the allegations in Paragraph 10 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 11:**

Defendants deny the allegations in Paragraph 11 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 12:**

Defendants deny the allegations in Paragraph 12 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 13:**

Defendants deny the allegations in Paragraph 13 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 14:**

Defendants deny the allegations in Paragraph 14 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 15:**

Uber admits it does not employ drivers. Defendants otherwise deny the allegations in Paragraph 15 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 16:**

Defendants deny the allegations in Paragraph 16 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 17:**

Defendants deny the allegations in Paragraph 17 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 18:**

Defendants deny the allegations in Paragraph 18 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 19:**

Defendants deny the allegations in Paragraph 19 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 20:**

Defendants deny the allegations in Paragraph 20 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 21:**

Defendants deny the allegations in Paragraph 21 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 22:**

Defendants deny the allegations in Paragraph 22 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 23:**

Defendants deny the allegations in Paragraph 23 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 24:**

Defendants deny the allegations in Paragraph 24 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 25:**

Defendants deny the allegations in Paragraph 25 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 26:**

Defendants deny the allegations in Paragraph 26 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 27:**

Defendants deny the allegations in Paragraph 27 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 28:**

Defendants deny the allegations in Paragraph 28 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 29:**

Defendants deny the allegations in Paragraph 29 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 30:**

Defendants deny the allegations in Paragraph 30 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 31:**

Defendants deny the allegations in Paragraph 31 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 32:**

Defendants deny the allegations in Paragraph 32 of the Complaint, except to the extent that they purport to quote statements appearing on the rainn.org website, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 33:**

Defendants deny the allegations in Paragraph 33 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 34:**

Defendants deny the allegations in Paragraph 34 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 35:**

Defendants deny the allegations in Paragraph 35 of the Complaint.

**RESPONSE TO “III. PARTIES”****Response to “A. Plaintiffs”****RESPONSE TO PARAGRAPH NO. 36:**

Defendants deny the allegations in Paragraph 36 of the Complaint.

**Response to “B. Defendants”****RESPONSE TO PARAGRAPH NO. 37:**

Uber Technologies, Inc. admits that it is a Delaware corporation with its principal place of business in San Francisco. The allegations in Paragraph 37 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 38:**

Defendant Rasier, LLC admits that it is a wholly owned subsidiary of Uber Technologies, Inc., and is a Delaware limited liability company with its principal place of business in San Francisco. The allegations in Paragraph 38 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 39:**

Defendant Rasier-CA, LLC admits that it is a Delaware limited liability company with its principal place of business in San Francisco. The allegations in Paragraph 39 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 40:**

Paragraph 40 of the Complaint does not require a response.

**RESPONSE TO “IV. JURISDICTION AND VENUE”**

**RESPONSE TO PARAGRAPH NO. 41:**

Paragraph 41 of the Complaint contains a legal conclusion that does not require a response.

**RESPONSE TO PARAGRAPH NO. 42:**

Paragraph 42 of the Complaint includes legal conclusions that do not require a response.

**RESPONSE TO PARAGRAPH NO. 43:**

Defendants admit that this Court has personal jurisdiction over them. Defendants otherwise deny the allegations in Paragraph 43.

**RESPONSE TO PARAGRAPH NO. 44:**

Defendants admit that this Court has personal jurisdiction over them. Defendants otherwise deny the allegations in Paragraph 44 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 45:**

Defendants admit that the JPML centralized pretrial proceedings in this Court. Defendants otherwise deny that venue is appropriate in this District for cases involving alleged incidents outside this District.

**RESPONSE TO PARAGRAPH NO. 46:**

Defendants deny that venue is appropriate in this District for cases involving alleged incidents outside this District.

**RESPONSE TO “V. FACTUAL ALLEGATIONS”**

**RESPONSE TO PARAGRAPH NO. 47:**

Defendants deny the allegations in Paragraph 47 of the Complaint.

**Response to “A. The Uber Transportation System”**

**RESPONSE TO PARAGRAPH NO. 48:**

Defendants deny the allegations in Paragraph 48 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 49:**

1 Defendants deny the allegations in Paragraph 49 of the Complaint, except they admit that the  
2 Uber platform connects people with various transportation options, including individuals who use their  
3 personal vehicle to provide transportation.

4 **RESPONSE TO PARAGRAPH NO. 50:**

5 Defendants deny the allegations in Paragraph 50 of the Complaint.

6 **RESPONSE TO PARAGRAPH NO. 51:**

7 Defendants deny the allegations in Paragraph 51 of the Complaint.

8 **RESPONSE TO PARAGRAPH NO. 52:**

9 Defendants deny the allegations in Paragraph 52 of the Complaint.

10 **RESPONSE TO PARAGRAPH NO. 53:**

11 Defendants deny the allegations in Paragraph 53 of the Complaint.

12 **RESPONSE TO PARAGRAPH NO. 54:**

13 Defendants deny the allegations in Paragraph 54 of the Complaint.

14 **RESPONSE TO PARAGRAPH NO. 55:**

15 Defendants deny the allegations in Paragraph 55 of the Complaint.

16 **RESPONSE TO PARAGRAPH NO. 56:**

17 Defendants deny the allegations in Paragraph 56 of the Complaint.

18 **RESPONSE TO PARAGRAPH NO. 57:**

19 Defendants deny the allegations in Paragraph 57 of the Complaint.

20 **RESPONSE TO PARAGRAPH NO. 58:**

21 Defendants deny the allegations in Paragraph 58 of the Complaint.

22 **RESPONSE TO PARAGRAPH NO. 59:**

23 Defendants deny the allegations in Paragraph 59 of the Complaint.

24 **RESPONSE TO PARAGRAPH NO. 60:**

25 Defendants deny the allegations in Paragraph 60 of the Complaint.

26  
27 **RESPONSE TO PARAGRAPH NO. 61:**

28 Defendants deny the allegations in Paragraph 61 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 62:**

Defendants deny the allegations in Paragraph 62 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 63:**

Defendants deny the allegations in Paragraph 63 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 64:**

Defendants deny the allegations in Paragraph 64 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 65:**

Defendants deny the allegations in Paragraph 65 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 66:**

Defendants deny the allegations in Paragraph 66 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 67:**

Defendants deny the allegations in Paragraph 67 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 68:**

Defendants deny the allegations in Paragraph 68 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 69:**

Defendants deny the allegations in Paragraph 69 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 70:**

Defendants deny the allegations in Paragraph 70 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 71:**

Defendants deny the allegations in Paragraph 71 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 72:**

Defendants deny the allegations in Paragraph 72 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 73:**

Defendants deny the allegations in Paragraph 73 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 74:**

Defendants deny the allegations in Paragraph 74 of the Complaint, and further deny that Uber employed drivers at any point.



**RESPONSE TO PARAGRAPH NO. 75:**

Defendants deny the allegations in Paragraph 75 of the Complaint, and further deny that Uber employed drivers at any point.

**RESPONSE TO PARAGRAPH NO. 76:**

Defendants deny the allegations in Paragraph 76 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 77:**

Defendants deny the allegations in Paragraph 77 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 78:**

Defendants deny the allegations in Paragraph 78 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 79:**

Defendants deny the allegations in Paragraph 79 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 80:**

Defendants deny the allegations in Paragraph 80 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 81:**

Defendants deny the allegations in Paragraph 81 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 82:**

Defendants deny the allegations in Paragraph 82 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 83:**

Defendants deny the allegations in Paragraph 83 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 84:**

Defendants deny the allegations in Paragraph 84 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 85:**

Defendants deny the allegations in Paragraph 85 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 86:**

Defendants deny the allegations in Paragraph 86 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 87:**

Defendants deny the allegations in Paragraph 87 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 88:**

Defendants deny the allegations in Paragraph 88 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 89:**

Defendants deny the allegations in Paragraph 89 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 90:**

Defendants deny the allegations in Paragraph 90 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 91:**

Defendants deny the allegations in Paragraph 91 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 92:**

Defendants deny the allegations in Paragraph 92 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 93:**

Defendants deny the allegations in Paragraph 93 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 94:**

Defendants deny the allegations in Paragraph 94 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 95:**

Defendants deny the allegations in Paragraph 95 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 96:**

Defendants deny the allegations in Paragraph 96 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 97:**

Defendants deny the allegations in Paragraph 97 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 98:**

Defendants deny the allegations in Paragraph 98 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 99:**

Defendants deny the allegations in Paragraph 99 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 100:**

Defendants deny the allegations in Paragraph 100 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 101:**

Defendants deny the allegations in Paragraph 101 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 102:**

Defendants deny the allegations in Paragraph 102 of the Complaint, except they admit that the time during which the driver is transporting the rider to her destination is referred to as “Period 3” (“P3”).

**RESPONSE TO PARAGRAPH NO. 103:**

Defendants deny the allegations in Paragraph 103 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 104:**

Defendants deny the allegations in Paragraph 104 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 105:**

Paragraph 105 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 105 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 106:**

Paragraph 106 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 106 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 107:**

Defendants deny the allegations in Paragraph 107 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 108:**

Defendants deny the allegations in Paragraph 108 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 109:**

Defendants deny the allegations in Paragraph 109 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 110:**

Defendants deny the allegations in Paragraph 110 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 111:**

1 Defendants deny the allegations in Paragraph 111 of the Complaint, except to the extent that they  
2 purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

3 **RESPONSE TO PARAGRAPH NO. 112:**

4 Paragraph 112 of the Complaint does not include any factual allegations directed at Uber. To the  
5 extent it is intended to insinuate that Uber did not act in a “careful and responsible” manner or in any  
6 other respects is directed at Uber, Defendants deny the allegations.

7 **RESPONSE TO PARAGRAPH NO. 113:**

8 Paragraph 113 of the Complaint does not include any factual allegations directed at Uber. To the  
9 extent it is intended to insinuate that Uber violated any “duty” or in any other respects is directed at  
10 Uber, Defendants deny the allegations.

11 **RESPONSE TO PARAGRAPH NO. 114:**

12 Paragraph 114 of the Complaint does not include any factual allegations directed at Uber. To the  
13 extent it is intended to assert allegations against Uber, Defendants deny any such allegations.

14 **RESPONSE TO PARAGRAPH NO. 115:**

15 Paragraph 115 of the Complaint does not include any factual allegations directed at Uber. To the  
16 extent it is intended to assert allegations against Uber, Defendants deny any such allegations.

17 **RESPONSE TO PARAGRAPH NO. 116:**

18 Defendants deny the allegations in Paragraph 116 of the Complaint.

19 **RESPONSE TO PARAGRAPH NO. 117:**

20 Defendants deny the allegations in Paragraph 117 of the Complaint.

21 **RESPONSE TO PARAGRAPH NO. 118:**

22 Defendants deny the allegations in Paragraph 118 of the Complaint.

23 **RESPONSE TO PARAGRAPH NO. 119:**

24 Defendants deny the allegations in Paragraph 119 of the Complaint.

25 **RESPONSE TO PARAGRAPH NO. 120:**

26 Paragraph 120 of the Complaint does not include any factual allegations directed at Uber. To the  
27 extent it is intended to assert allegations against Uber, Defendants deny any such allegations.

28 **RESPONSE TO PARAGRAPH NO. 121:**

Defendants deny the allegations in Paragraph 121 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 122:**

Defendants deny the allegations in Paragraph 122 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 123:**

Defendants deny the allegations in Paragraph 123 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 124:**

Defendants deny the allegations in Paragraph 124 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 125:**

Defendants deny the allegations in Paragraph 125 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 126:**

Defendants deny the allegations in Paragraph 126 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 127:**

Defendants deny the allegations in Paragraph 127 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 128:**

Defendants deny the allegations in Paragraph 128 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 129:**

Defendants deny the allegations in Paragraph 129 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 130:**

Defendants deny the allegations in Paragraph 130 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 131:**

Defendants deny the allegations in Paragraph 131 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 132:**

Defendants deny the allegations in Paragraph 132 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 133:**

Defendants deny the allegations in Paragraph 133 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 134:**

Defendants deny the allegations in Paragraph 134 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 135:**

Defendants deny the allegations in Paragraph 135 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 136:**

Defendants deny the allegations in Paragraph 136 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 137:**

Defendants deny the allegations in Paragraph 137 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 138:**

Defendants deny the allegations in Paragraph 138 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 139:**

Defendants deny the allegations in Paragraph 139 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 140:**

Defendants deny the allegations in Paragraph 140 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 141:**

Defendants deny the allegations in Paragraph 141 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 142:**

Defendants deny the allegations in Paragraph 142 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 143:**

Defendants deny the allegations in Paragraph 143 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 144:**

Defendants deny the allegations in Paragraph 144 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 145:**

Defendants deny the allegations in Paragraph 145 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 146:**

Defendants deny the allegations in Paragraph 146 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 147:**

Defendants deny the allegations in Paragraph 147 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 148:**

Defendants deny the allegations in Paragraph 148 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 149:**

Defendants deny the allegations in Paragraph 149 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 150:**

Defendants deny the allegations in Paragraph 150 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 151:**

Defendants deny the allegations in Paragraph 151 of the Complaint, except to the extent that they purport to reference any complaints or related public statements, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 152:**

Paragraph 152 of the Complaint appears to reference public reports, the contents of which speak for themselves. In all other respects, the allegations are denied.

**RESPONSE TO PARAGRAPH NO. 153:**

Paragraph 153 of the Complaint appears to reference public reports, the contents of which speak for themselves. In all other respects, the allegations are denied.

**RESPONSE TO PARAGRAPH NO. 154:**

Defendants deny the allegations in Paragraph 154 of the Complaint, except to the extent that they purport to quote a referenced document, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 155:**

Defendants deny the allegations in Paragraph 155 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 156:**

Defendants deny the allegations in Paragraph 156 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 157:**

Defendants deny the allegations in Paragraph 157 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 158:**

Defendants deny the allegations in Paragraph 158 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 159:**

Paragraph 159 of the Complaint purports to quote a statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 159 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 160:**

Defendants deny the allegations in Paragraph 160 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 161:**

Defendants deny the allegations in Paragraph 161 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 162:**

Defendants deny the allegations in Paragraph 162 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 163:**

Defendants deny the allegations in Paragraph 163 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 164:**

Defendants admit that there are no fingerprinting requirements for drivers prior to gaining access to the driver version of the Uber app in the U.S., except as required by law. In all other respects, Defendants deny the allegations in Paragraph 164 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 165:**

Defendants deny the allegations in Paragraph 165 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 166:**

Defendants deny the allegations in Paragraph 166 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 167:**

Defendants admit that Uber does not require references for drivers prior to gaining access to the driver version of the Uber app in the U.S. Defendants otherwise deny the allegations in Paragraph 167 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 168:**

Defendants deny the allegations in Paragraph 168 of the Complaint.



**RESPONSE TO PARAGRAPH NO. 169:**

Paragraph 169 of the Complaint purports to quote a statement allegedly made by Uber on its website. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 169 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 170:**

Defendants deny the allegations in Paragraph 170 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 171:**

Defendants deny the allegations in Paragraph 171 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 172:**

Defendants deny the allegations in Paragraph 172 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 173:**

Defendants deny the allegations in Paragraph 173 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 174:**

Defendants deny the allegations in Paragraph 174 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 175:**

Defendants deny the allegations in Paragraph 175 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 176:**

Defendants deny the allegations in Paragraph 176 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 177:**

Defendants deny the allegations in Paragraph 177 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 178:**

Defendants deny the allegations in Paragraph 178 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 179:**

Defendants deny the allegations in Paragraph 179 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 180:**

Defendants deny the allegations in Paragraph 180 of the Complaint, except to the extent that they purport to quote a document, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 181:**

Defendants deny the allegations in Paragraph 181 of the Complaint, except to the extent that they purport to quote public documents, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 182:**

Defendants deny the allegations in Paragraph 182 of the Complaint, except to the extent that they purport to quote an article, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 183:**

Defendants deny the allegations in Paragraph 183 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 184:**

Defendants deny the allegations in Paragraph 184 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 185:**

Defendants deny the allegations in Paragraph 185 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 186:**

Defendants deny the allegations in Paragraph 186 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 187:**

Defendants deny the allegations in Paragraph 187 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 188:**

Defendants deny the allegations in Paragraph 188 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 189:**

Uber is committed to safety—from the creation of new standards to the development of technology with the aim of reducing incidents. Defendants otherwise deny the allegations in Paragraph 189 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 190:**

Defendants deny the allegations in Paragraph 190 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 191:**

Defendants deny the allegations in Paragraph 191 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 192:**

Paragraph 192 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 192 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 193:**

Defendants deny the allegations in Paragraph 193 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 194:**

Defendants deny the allegations in Paragraph 194 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 195:**

Defendants deny the allegations in Paragraph 195 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 196:**

Paragraph 196 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 196 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 197:**

Paragraph 197 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 197 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 198:**

Paragraph 198 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 198 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 199:**

Defendants deny the allegations in Paragraph 199 of the Complaint, except to the extent that they purport to quote statements allegedly made by Uber, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 200:**

Paragraph 200 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 200 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 201:**

Paragraph 201 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 201 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 202:**

Paragraph 202 of the Complaint references a news website article, the contents of which speak for themselves. The allegations in Paragraph 202 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 203:**

Paragraph 203 of the Complaint references Uber's website, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 204:**

Paragraph 204 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 204 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 205:**

Defendants deny the allegations in Paragraph 205 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 206:**

Paragraph 206 of the Complaint purports to quote an advertisement allegedly made by Uber. To the extent this advertisement exists, its contents speak for themselves. The allegations in Paragraph 206 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 207:**

Paragraph 207 of the Complaint purports to quote unidentified advertising statements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 207 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 208:**

1 Defendants deny the allegations in Paragraph 208 of the Complaint.

2 **RESPONSE TO PARAGRAPH NO. 209:**

3 Defendants deny the allegations in Paragraph 209 of the Complaint, except to the extent they  
4 purport to reference statements on Uber's website, the contents of which speak for themselves.

5 **RESPONSE TO PARAGRAPH NO. 210:**

6 Defendants deny the allegations in Paragraph 210 of the Complaint, except to the extent they  
7 purport to quote a statement allegedly made by Uber, the contents of which speak for themselves.

8 **RESPONSE TO PARAGRAPH NO. 211:**

9 Defendants deny the allegations in Paragraph 211 of the Complaint, except to the extent they  
10 purport to quote unidentified statements allegedly made by Uber, the contents of which speak for  
11 themselves.

12 **RESPONSE TO PARAGRAPH NO. 212:**

13 Paragraph 212 of the Complaint purports to quote an unidentified statement allegedly made by  
14 Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph  
15 212 are otherwise denied.

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19 **RESPONSE TO PARAGRAPH NO. 213:**

20 Paragraph 213 of the Complaint purports to quote unidentified statements. To the extent these  
21 statements exist, their contents speak for themselves. The allegations in Paragraph 213 are otherwise  
22 denied.

23 **RESPONSE TO PARAGRAPH NO. 214:**

24 Paragraph 214 of the Complaint purports to quote an unidentified statement allegedly made by  
25 Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph  
26 214 are otherwise denied.

27 **RESPONSE TO PARAGRAPH NO. 215:**

Paragraph 215 of the Complaint purports to quote statements from unidentified advertisements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 215 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 216:**

Defendants deny the allegations in Paragraph 216 of the Complaint, except to the extent it purports to quote an unidentified statement allegedly made by Uber, the contents of which, if it exists, speak for themselves.

**RESPONSE TO PARAGRAPH NO. 217:**

Paragraph 217 of the Complaint purports to quote advertising statements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 217 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 218:**

Paragraph 218 of the Complaint purports to quote an unidentified statement on Uber's website. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 218 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 219:**

Paragraph 219 of the Complaint purports to quote an unidentified statement on Uber's website. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 219 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 220:**

Paragraph 220 of the Complaint purports to quote unidentified statements on Uber's website. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 220 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 221:**

Paragraph 221 of the Complaint purports to quote unidentified statements on Uber's website. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 221 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 222:**

Defendants deny the allegations in Paragraph 222 of the Complaint, except to the extent Paragraph 222 references Uber's website, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 223:**

Paragraph 223 of the Complaint includes images purportedly appearing on Uber's website, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 224:**

Defendants deny the allegations in Paragraph 224 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 225:**

Defendants deny the allegations in Paragraph 225 of the Complaint, except to the extent they purport to depict advertisements by Uber, the contents of which, if they exist, speak for themselves. The allegations in Paragraph 225 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 226:**

Defendants deny the allegations in Paragraph 226 of the Complaint, except to the extent that it references a YouTube video purportedly made by Uber, the contents of which, if they exist, speak for themselves.

**RESPONSE TO PARAGRAPH NO. 227:**

Paragraph 227 of the Complaint purports to quote unidentified statements on Uber's website. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 227 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 228:**

Defendants deny the allegations in Paragraph 228 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 229:**

Paragraph 229 of the Complaint does not include any allegations against Uber and does not require a response. To the extent Plaintiffs intend to include allegations against Uber, they are denied.

**RESPONSE TO PARAGRAPH NO. 230:**

Defendants deny the allegations in Paragraph 230 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 231:**

Defendants deny the allegations in Paragraph 231 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 232:**

Defendants deny the allegations in Paragraph 232 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 233:**

Paragraph 233 of the Complaint references and quotes from a report purportedly issued by Uber and Mothers Against Drunk Driving, the contents of which, if they exist, speak for themselves. The allegations in Paragraph 233 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 234:**

Paragraph 234 of the Complaint references a YouTube video allegedly published by Uber, the contents of which, if they exist, speak for themselves. The allegations in Paragraph 234 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 235:**

Paragraph 235 of the Complaint purports to quote an unidentified advertising statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 235 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 236:**

Paragraph 236 of the Complaint purports to quote unidentified advertisements by Uber. To the extent these advertisements exist, their contents speak for themselves. The allegations in Paragraph 236 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 237:**

Defendants deny the allegations in Paragraph 237 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 238:**

Defendants deny the allegations in Paragraph 238 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 239:**

Defendants deny the allegations in Paragraph 239 of the Complaint.



**RESPONSE TO PARAGRAPH NO. 240:**

Paragraph 240 of the Complaint is not directed at Uber and does not require a response. To the extent Plaintiffs intend to include allegations against Uber, they are denied.

**RESPONSE TO PARAGRAPH NO. 241:**

Defendants deny the allegations in Paragraph 241 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 242:**

Defendants deny the allegations in Paragraph 242 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 243:**

Defendants deny the allegations in Paragraph 243 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 244:**

Defendants deny the allegations in Paragraph 244 of the Complaint, except to the extent they reference and purport to quote statements allegedly made by Uber, the contents of which, if they exist, speak for themselves.

**RESPONSE TO PARAGRAPH NO. 245:**

Defendants deny the allegations in Paragraph 245 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 246:**

Defendants deny the allegations in Paragraph 246 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 247:**

Defendants deny the allegations in Paragraph 247 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 248:**

Defendants deny the allegations in Paragraph 248 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 249:**

Defendants deny the allegations in Paragraph 249 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 250:**

Defendants deny the allegations in Paragraph 250 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 251:**

Defendants deny the allegations in Paragraph 251 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 252:**

Defendants deny the allegations in Paragraph 252 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 253:**

Defendants deny the allegations in Paragraph 253 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 254:**

Defendants deny the allegations in Paragraph 254 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 255:**

Defendants deny the allegations in Paragraph 255 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 256:**

Paragraph 256 of the Complaint references and purports to quote from a newspaper article, the contents of which, if they exist, speak for themselves. The allegations in Paragraph 256 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 257:**

Defendants deny the allegations in Paragraph 257 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 258:**

Defendants deny the allegations in Paragraph 258 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 259:**

Defendants deny the allegations in Paragraph 259 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 260:**

Defendants deny the allegations in Paragraph 260 of the Complaint as stated. Uber further notes that following reports of the referenced incident, Uber's former CEO Travis Kalanick issued the following statement: "What happened over the weekend in New Delhi is horrific. Our entire team's hearts go out to the victim of this despicable crime. We will do everything, I repeat, everything to help bring this perpetrator to justice and to support the victim and her family in her recovery. We will work with the government to establish clear background checks currently absent in their commercial transportation licensing programs. We will also partner closely with the groups who are leading the way

on women's safety here in New Delhi and around the country and invest in technology advances to help make New Delhi a safer city for women."

**RESPONSE TO PARAGRAPH NO. 261:**

Defendants deny the allegations in Paragraph 261 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 262:**

Defendants deny the allegations in Paragraph 262 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 263:**

Defendants deny the allegations in Paragraph 263 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 264:**

Defendants deny the allegations in Paragraph 264 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 265:**

Defendants deny the allegations in Paragraph 265 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 266:**

Defendants deny the allegations in Paragraph 266 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 267:**

Paragraph 267 of the Complaint quotes Uber's public securities filings, the contents of which speak for themselves. In all other respects, the allegations are denied.

**RESPONSE TO PARAGRAPH NO. 268:**

Defendants deny the allegations in Paragraph 268 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 269:**

Defendants deny the allegations in Paragraph 269 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 270:**

Paragraph 270 of the Complaint references and purports to quote statements allegedly made by Tony West, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 271:**

Paragraph 271 of the Complaint references and purports to quote statements by Uber and depict its published Taxonomy, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 272:**

Defendants deny the allegations in Paragraph 272 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 273:**

Paragraph 273 of the Complaint references and purports to discuss the findings of Uber's 2019 Safety Report, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 274:**

Defendants deny the allegations in Paragraph 274 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 275:**

Defendants deny the allegations in Paragraph 275 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 276:**

Defendants deny the allegations in Paragraph 276 of the Complaint, except that Paragraph 276 references a California Public Utilities Commission (CPUC) press release, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 277:**

Defendants deny the allegations in Paragraph 277 of the Complaint, except that Defendants admit that Uber has published three US Safety Reports.

**RESPONSE TO PARAGRAPH NO. 278:**

Paragraph 278 of the Complaint references the Uber US Safety Report covering 2019-2020, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 279:**

Defendants deny the allegations in Paragraph 279 of the Complaint, except to the extent they reference Uber's 2020 10-K, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 280:**

Defendants deny the allegations in Paragraph 280 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 281:**

Defendants deny the allegations in Paragraph 281 of the Complaint.

**Response to "H."**

**RESPONSE TO PARAGRAPH NO. 282:**

Defendants deny the allegations in Paragraph 282 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 283:**

Defendants deny the allegations in Paragraph 283 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 284:**

Defendants deny the allegations in Paragraph 284 of the Complaint, except to the extent they reference the Uber mobile application, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 285:**

Defendants deny the allegations in Paragraph 285 of the Complaint, except to the extent they reference the Uber mobile application, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 286:**

Defendants deny the allegations in Paragraph 286 of the Complaint, except to the extent they reference the Uber mobile application, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 287:**

Defendants deny the allegations in Paragraph 287 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 288:**

Defendants deny the allegations in Paragraph 288 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 289:**

Defendants deny the allegations in Paragraph 289 of the Complaint, except to the extent they reference the Uber mobile application, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 290:**

Defendants deny the allegations in Paragraph 290 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 291:**

Defendants deny the allegations in Paragraph 291 of the Complaint as stated.

**RESPONSE TO PARAGRAPH NO. 292:**

Paragraph 292 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 292 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 293:**

Defendants deny the allegations in Paragraph 293 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 294:**

Defendants deny the allegations in Paragraph 294 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 295:**

Paragraph 295 of the Complaint is not directed at Defendants and does not require a response. To the extent a response is required, Paragraph 295 purports to cite unidentified “[r]esearch,” the contents of which speak for themselves. Defendants otherwise deny the allegations in Paragraph 295.

**RESPONSE TO PARAGRAPH NO. 296:**

Defendants deny the allegations in Paragraph 296 of the Complaint, except to the extent they reference a newspaper article, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 297:**

Paragraph 297 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 297 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 298:**

Defendants deny the allegations in Paragraph 298 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 299:**

Defendants deny the allegations in Paragraph 299 of the Complaint, except to the extent they reference a newspaper article, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 300:**

Paragraph 300 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 300 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 301:**

Paragraph 301 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 301 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 302:**

Paragraph 302 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 302 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 303:**

Paragraph 303 of the Complaint purports to quote an unidentified statement allegedly made by Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph 303 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 304:**

Defendants deny the allegations in Paragraph 304 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 305:**

Defendants deny the allegations in Paragraph 305 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 306:**

Defendants deny the allegations in Paragraph 306 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 307:**

Defendants deny the allegations in Paragraph 307 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 308:**

Defendants deny the allegations in Paragraph 308 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 309:**

Defendants deny the allegations in Paragraph 309 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 310:**

Defendants deny the allegations in Paragraph 310 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 311:**

1 Defendants deny the allegations in Paragraph 311 of the Complaint, except to the extent they  
2 reference a statement purportedly made by Uber. To the extent this statement exists, its contents speak  
3 for themselves.

4 **RESPONSE TO PARAGRAPH NO. 312:**

5 Paragraph 312 of the Complaint purports to quote an unidentified statement allegedly made by  
6 Uber. To the extent this statement exists, its contents speak for themselves. The allegations in Paragraph  
7 312 are otherwise denied.

8 **RESPONSE TO PARAGRAPH NO. 313:**

9 Defendants deny the allegations in Paragraph 313 of the Complaint.

10 **RESPONSE TO PARAGRAPH NO. 314:**

11 Defendants deny the allegations in Paragraph 314 of the Complaint.

12 **RESPONSE TO PARAGRAPH NO. 315:**

13 Defendants deny the allegations in Paragraph 315 of the Complaint.

14  
15 **RESPONSE TO PARAGRAPH NO. 316:**

16 Defendants deny the allegations in Paragraph 316 of the Complaint.

17 **Response to “I.”**

18 **RESPONSE TO PARAGRAPH NO. 317:**

19 Defendants deny the allegations in Paragraph 317 of the Complaint.

20 **RESPONSE TO PARAGRAPH NO. 318:**

21 Defendants deny the allegations in Paragraph 318 of the Complaint.

22 **RESPONSE TO PARAGRAPH NO. 319:**

23 Defendants deny the allegations in Paragraph 319 of the Complaint.

24 **RESPONSE TO PARAGRAPH NO. 320:**

25 Defendants deny the allegations in Paragraph 320 of the Complaint, except to the extent they  
26 reference a newspaper article, the contents of which speak for themselves.

27 **RESPONSE TO PARAGRAPH NO. 321:**



Defendants deny the allegations in Paragraph 321 of the Complaint, except to the extent they reference a third-party report and reference and purport to quote from a third-party publication, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 322:**

Paragraph 322 of the Complaint references a third-party report and a third-party publication, the contents of which speak for themselves. The allegations in Paragraph 322 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 323:**

Defendants deny the allegations in Paragraph 323 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 324:**

Defendants deny the allegations in Paragraph 324 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 325:**

Defendants deny the allegations in Paragraph 325 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 326:**

Defendants deny the allegations in Paragraph 326 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 327:**

Defendants deny the allegations in Paragraph 327 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 328:**

Defendants deny the allegations in Paragraph 328 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 329:**

Defendants deny the allegations in Paragraph 329 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 330:**

Defendants deny the allegations in Paragraph 330 of the Complaint, except to the extent Paragraph 330 of the Complaint references a third-party publication, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 331:**

Paragraph 331 of the Complaint references and purports to quote a third-party publication, the contents of which speak for themselves. In all other respects, the allegations are denied.

**RESPONSE TO PARAGRAPH NO. 332:**

1 Defendants deny the allegations in Paragraph 332 of the Complaint.

2 **RESPONSE TO PARAGRAPH NO. 333:**

3 Paragraph 333 of the Complaint references a court order, the contents of which speak for  
4 themselves. In all other respects, the allegations are denied.

5 **RESPONSE TO PARAGRAPH NO. 334:**

6 Defendants deny the allegations in Paragraph 334 of the Complaint, except to the extent  
7 Paragraph 334 references a newspaper article and a letter to Uber, the contents of which speak for  
8 themselves.

9 **RESPONSE TO “VI. TOLLING OF STATUTES OF LIMITATIONS”**

10 **RESPONSE TO PARAGRAPH NO. 335:**

11 Defendants deny the allegations in Paragraph 335 of the Complaint.

12 **RESPONSE TO PARAGRAPH NO. 336:**

13 Defendants deny the allegations in Paragraph 336 of the Complaint.

14 **RESPONSE TO PARAGRAPH NO. 337:**

15 Defendants deny the allegations in Paragraph 337 of the Complaint.

16 **RESPONSE TO PARAGRAPH NO. 338:**

17 Defendants deny the allegations in Paragraph 338 of the Complaint.

18 **RESPONSE TO PARAGRAPH NO. 339:**

19 Defendants deny the allegations in Paragraph 339 of the Complaint.

20 **RESPONSE TO “VII. PUNITIVE DAMAGES”**

21 **RESPONSE TO PARAGRAPH NO. 340:**

22 Defendants deny that Plaintiffs are entitled to punitive damages or to any relief whatsoever.

23 **RESPONSE TO PARAGRAPH NO. 341:**

24 Defendants deny the allegations in Paragraph 341 of the Complaint.

25 **RESPONSE TO PARAGRAPH NO. 342:**

26 Defendants deny the allegations in Paragraph 342 of the Complaint.

27 **RESPONSE TO PARAGRAPH NO. 343:**

28 Defendants deny the allegations in Paragraph 343 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 344:**

Defendants deny the allegations in Paragraph 344 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 345:**

Defendants deny the allegations in Paragraph 345 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 346:**

Defendants deny the allegations in Paragraph 346 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 347:**

Defendants deny the allegations in Paragraph 347 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 348:**

Defendants deny the allegations in Paragraph 348 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 349:**

Defendants deny the allegations in Paragraph 349 of the Complaint.

**RESPONSE TO “VIII. STANDING TO SEEK INJUNCTIVE RELIEF”**

**RESPONSE TO PARAGRAPH NO. 350:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350 of the Complaint and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 351:**

Defendants deny the allegations in Paragraph 351 of the Complaint, except Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351 of the Complaint relating to Lyft and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 352:**

Defendants deny the allegations in Paragraph 352 of the Complaint except Defendants are without knowledge or information sufficient to form a belief as to what Plaintiffs expect.

**RESPONSE TO PARAGRAPH NO. 353:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353 of the Complaint and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 354:**

Defendants deny the allegations in Paragraph 354 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 355:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355 of the Complaint and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 356:**

Defendants deny the allegations in Paragraph 356 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 357:**

Defendants deny the allegations in Paragraph 357 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 358:**

Defendants deny the allegations in Paragraph 358 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 359:**

Defendants deny the allegations in Paragraph 359 of the Complaint.

**RESPONSE TO “IX. CLAIMS”**

**RESPONSE TO PARAGRAPH NO. 360:**

Defendants deny that Plaintiffs are entitled to relief under any state laws.

**RESPONSE TO PARAGRAPH NO. 361:**

Paragraph 361 of the Complaint is not directed at Uber and does not require a response.

**Response to “B. Negligence (including Negligent Hiring, Retention, Supervision, and Entrustment)”**

**RESPONSE TO PARAGRAPH NO. 362:**

Defendants deny that Plaintiffs are entitled to any relief for negligence under any theory.

**RESPONSE TO PARAGRAPH NO. 363:**

Defendants deny the allegations in Paragraph 363 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 364:**

Defendants deny the allegations in Paragraph 364 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 365:**

Defendants deny the allegations in Paragraph 365 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 366:**

Defendants deny the allegations in Paragraph 366 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 367:**

Defendants deny the allegations in Paragraph 367 of the Complaint.

**Response to “C. Fraud and Misrepresentation”**

**RESPONSE TO PARAGRAPH NO. 368:**

Defendants deny that Plaintiffs are entitled to relief under either theory of misrepresentation identified in Paragraph 368 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 369:**

Paragraph 369 of the Complaint purports to reference unidentified statements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 369 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 370:**

Defendants deny the allegations in Paragraph 370 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 371:**

Defendants deny the allegations in Paragraph 371 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 372:**

Defendants deny the allegations in Paragraph 372 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 373:**

Defendants deny the allegations in Paragraph 373 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 374:**

Defendants deny the allegations in Paragraph 374 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 375:**

Defendants deny the allegations in Paragraph 375 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 376:**

Defendants deny the allegations in Paragraph 376 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 377:**

Defendants deny the allegations in Paragraph 377 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 378:**

Defendants deny the allegations in Paragraph 378 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 379:**

Defendants deny the allegations in Paragraph 379 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 380:**

Defendants deny the allegations in Paragraph 380 of the Complaint.

**Response to “D. Negligent Infliction of Emotional Distress”**

**RESPONSE TO PARAGRAPH NO. 381:**

Plaintiffs’ claims for negligent infliction of emotional distress have been dismissed. (*See* PTO 17 at 37-38, PTO 18 at 2, 7.) Paragraph 381 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 382:**

Plaintiffs’ claims for negligent infliction of emotional distress have been dismissed. (*See* PTO 17 at 37-38, PTO 18 at 2, 7.) Paragraph 382 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 383:**

Plaintiffs’ claims for negligent infliction of emotional distress have been dismissed. (*See* PTO 17 at 37-38, PTO 18 at 2, 7.) Paragraph 383 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 384:**

Plaintiffs’ claims for negligent infliction of emotional distress have been dismissed. (*See* PTO 17 at 37-38, PTO 18 at 2, 7.) Paragraph 384 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 385:**

Plaintiffs’ claims for negligent infliction of emotional distress have been dismissed. (*See* PTO 17 at 37-38, PTO 18 at 2, 7.) Paragraph 385 of the Complaint accordingly does not require a response.

**Response to “E. Common Carrier’s Non-Delegable Duty to Provide Safe Transportation  
[Certain States Only]”**

**RESPONSE TO PARAGRAPH NO. 386:**

Defendants deny that Plaintiffs are entitled to relief under any of the states’ laws listed in Paragraph 386 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 387:**

Defendants deny the allegations in Paragraph 387 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 388:**

Defendants deny the allegations in Paragraph 388 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 389:**

Defendants deny the allegations in Paragraph 389 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 390:**

Defendants deny the allegations in Paragraph 390 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 391:**

Paragraph 391 of the Complaint purports to reference unidentified statements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. The allegations in Paragraph 391 are otherwise denied.

**RESPONSE TO PARAGRAPH NO. 392:**

Defendants deny the allegations in Paragraph 392 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 393:**

Defendants deny the allegations in Paragraph 393 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 394:**

Defendants deny the allegations in Paragraph 394 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 395:**

Defendants deny the allegations in Paragraph 395 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 396:**

Defendants deny the allegations in Paragraph 396 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 397:**

Defendants deny the allegations in Paragraph 397 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 398:**

Defendants deny the allegations in Paragraph 398 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 399:**

Defendants deny the allegations in Paragraph 399 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 400:**

Defendants deny the allegations in Paragraph 400 of the Complaint.

**Response to “F. Other Non-Delegable Duties to Provide Safe Transportation [Certain States Only]”**

**RESPONSE TO PARAGRAPH NO. 401:**

Plaintiffs’ claims based on “non-delegable duties to provide safe transportation” have been dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 401 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 402:**

Plaintiffs’ claims based on “non-delegable duties to provide safe transportation” have been dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 402 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 403:**

Plaintiffs’ claims based on “non-delegable duties to provide safe transportation” have been dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 403 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 404:**

Plaintiffs’ claims based on “non-delegable duties to provide safe transportation” have been dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 404 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 405:**

Plaintiffs’ claims based on non-delegable duties to provide safe transportation” have been dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 405 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 406:**



1 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
2 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 406 of the Complaint accordingly does not  
3 require a response.

4 **RESPONSE TO PARAGRAPH NO. 407:**

5 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
6 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 407 of the Complaint accordingly does not  
7 require a response.

8  
9  
10 **RESPONSE TO PARAGRAPH NO. 408:**

11 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
12 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 408 of the Complaint accordingly does not  
13 require a response.

14 **RESPONSE TO PARAGRAPH NO. 409:**

15 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
16 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 409 of the Complaint accordingly does not  
17 require a response.

18 **RESPONSE TO PARAGRAPH NO. 410:**

19 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
20 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 410 of the Complaint accordingly does not  
21 require a response.

22 **RESPONSE TO PARAGRAPH NO. 411:**

23 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
24 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 411 of the Complaint accordingly does not  
25 require a response.

26 **RESPONSE TO PARAGRAPH NO. 412:**

1 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 2 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 412 of the Complaint accordingly does not  
 3 require a response.

4 **RESPONSE TO PARAGRAPH NO. 413:**

5 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 6 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 413 of the Complaint accordingly does not  
 7 require a response.

8 **RESPONSE TO PARAGRAPH NO. 414:**

9 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 10 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 414 of the Complaint accordingly does not  
 11 require a response.

12 **RESPONSE TO PARAGRAPH NO. 415:**

13 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 14 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 415 of the Complaint accordingly does not  
 15 require a response.

16 **RESPONSE TO PARAGRAPH NO. 416:**

17 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 18 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 416 of the Complaint accordingly does not  
 19 require a response.

20 **RESPONSE TO PARAGRAPH NO. 417:**

21 Plaintiffs' claims based on "non-delegable duties to provide safe transportation" have been  
 22 dismissed. (*See* PTO 17 at 35, PTO 18 at 9.) Paragraph 417 of the Complaint accordingly does not  
 23 require a response.

24 **Response to "G. Vicarious Liability for Drivers' Torts (Employee, Retained Control,**  
 25 **Apparent Agency, Ratification, California Public Utilities Code)"**

26 **RESPONSE TO PARAGRAPH NO. 418:**

27 Defendants deny the allegations in Paragraph 418 of the Complaint.

28 **Response to "1. Employee [Certain States Only]"**

**RESPONSE TO PARAGRAPH NO. 419:**

In response to Paragraph 419 of the Complaint, Defendants deny that Plaintiffs are entitled to relief under the laws of any State.

**RESPONSE TO PARAGRAPH NO. 420:**

Defendants deny the allegations in Paragraph 420 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 421:**

Defendants deny the allegations in Paragraph 421 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 422:**

Defendants deny the allegations in Paragraph 422 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 423:**

Defendants deny the allegations in Paragraph 423 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 424:**

Defendants deny the allegations in Paragraph 424 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 425:**

Defendants deny the allegations in Paragraph 425 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 426:**

Defendants deny the allegations in Paragraph 426 of the Complaint.

**Response to “2. Apparent Agency”**

**RESPONSE TO PARAGRAPH NO. 427:**

Defendants deny the allegations in Paragraph 427 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 428:**

Defendants deny the allegations in Paragraph 428 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 429:**

Defendants deny the allegations in Paragraph 429 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 430:**

Defendants deny the allegations in Paragraph 430 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 431:**

Defendants deny the allegations in Paragraph 431 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 432:**

Defendants deny the allegations in Paragraph 432 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 433:**

Defendants deny the allegations in Paragraph 433 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 434:**

Defendants deny the allegations in Paragraph 434 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 435:**

Defendants deny the allegations in Paragraph 435 of the Complaint.

**Response to “3. Ratification”**

**RESPONSE TO PARAGRAPH NO. 436:**

Defendants deny the allegations in Paragraph 436 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 437:**

Defendants deny the allegations in Paragraph 437 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 438:**

Defendants deny the allegations in Paragraph 438 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 439:**

Defendants deny the allegations in Paragraph 439 of the Complaint.

**Response to “4. California Public Utilities Code § 535”**

**RESPONSE TO PARAGRAPH NO. 440:**

Defendants deny the allegations in Paragraph 440 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 441:**

Defendants deny the allegations in Paragraph 441 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 442:**

Paragraph 442 of the Complaint purports to quote from California Public Utilities Code § 5354, the contents of which speak for themselves.

**RESPONSE TO PARAGRAPH NO. 443:**

Defendants deny the allegations in Paragraph 443 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 444:**

Defendants deny the allegations in Paragraph 444 of the Complaint.

**Response to “H. Strict Products Liability (Failure to Warn and Design Defect)”**

**RESPONSE TO PARAGRAPH NO. 445:**

Defendants deny the allegations in Paragraph 445 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 446:**

Defendants deny the allegations in Paragraph 446 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 447:**

Defendants deny the allegations in Paragraph 447 of the Complaint, except Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding Microsoft Office and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 448:**

Defendants deny the allegations in Paragraph 448 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 449:**

Defendants deny the allegations in Paragraph 449 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 450:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450 of the Complaint insofar as they address social media platforms and therefore deny the same. Defendants otherwise deny the allegations in this paragraph.

**RESPONSE TO PARAGRAPH NO. 451:**

Defendants deny the allegations in Paragraph 451 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 452:**

Defendants deny the allegations in Paragraph 452 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 453:**

Defendants deny the allegations in Paragraph 453 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 454:**

Defendants deny the allegations in Paragraph 454 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 455:**

Defendants deny the allegations in Paragraph 455 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 456:**

Defendants deny the allegations in Paragraph 456 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 457:**

Defendants deny the allegations in Paragraph 457 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 458:**

Defendants deny the allegations in Paragraph 458 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 459:**

Defendants deny the allegations in Paragraph 459 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 460:**

Defendants deny the allegations in Paragraph 460 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 461:**

Defendants deny the allegations in Paragraph 461 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 462:**

Defendants deny the allegations in Paragraph 462 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 463:**

Defendants admit that the Uber platform helps facilitate the exchange of data and information between riders and drivers who use the Uber platform. Defendants otherwise deny the allegations in Paragraph 463 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 464:**

Defendants deny the allegations in Paragraph 464 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 465:**

Defendants deny the allegations in Paragraph 465 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 466:**

Defendants deny the allegations in Paragraph 466 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 467:**

Defendants deny the allegations in Paragraph 467 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 468:**

Defendants deny the allegations in Paragraph 468 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 469:**

Paragraph 469 of the Complaint purports to reference unidentified statements allegedly made by Uber. To the extent these statements exist, their contents speak for themselves. In all other respects, the allegations are denied.

**RESPONSE TO PARAGRAPH NO. 470:**

Defendants deny the allegations in Paragraph 470 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 471:**

Defendants deny the allegations in Paragraph 471 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 472:**

Defendants deny the allegations in Paragraph 472 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 473:**

Defendants deny the allegations in Paragraph 473 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 474:**

Defendants deny the allegations in Paragraph 474 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 475:**

Defendants deny the allegations in Paragraph 475 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 476:**

Defendants deny the allegations in Paragraph 476 of the Complaint.

**Response to “1. Design Defect”**

**RESPONSE TO PARAGRAPH NO. 477:**

Defendants deny the allegations in Paragraph 477 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 478:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478 of the Complaint and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 479:**

Defendants deny the allegations in Paragraph 479 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 480:**

Defendants deny the allegations in Paragraph 480 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 481:**

Defendants deny the allegations in Paragraph 481 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 482:**

Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 of the Complaint and therefore deny the same.

**RESPONSE TO PARAGRAPH NO. 483:**

Defendants deny the allegations in Paragraph 483 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 484:**

Defendants deny the allegations in Paragraph 484 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 485:**

Defendants deny the allegations in Paragraph 485 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 486:**

Defendants deny the allegations in Paragraph 486 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 487:**

Defendants deny the allegations in Paragraph 487 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 488:**

Defendants deny the allegations in Paragraph 488 of the Complaint and its subparts.

**RESPONSE TO PARAGRAPH NO. 489:**

Defendants deny the allegations in Paragraph 489 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 490:**

Defendants deny the allegations in Paragraph 490 of the Complaint.

**Response to “2. Failure to Warn”**

**RESPONSE TO PARAGRAPH NO. 491:**

Defendants deny the allegations in Paragraph 491 of the Complaint.

**RESPONSE TO PARAGRAPH NO. 492:**



1 Defendants are without knowledge or information sufficient to form a belief as to the truth of the  
2 allegations in Paragraph 492 of the Complaint and therefore deny the same.

3 **RESPONSE TO PARAGRAPH NO. 493:**

4 Defendants deny the allegations in Paragraph 493 of the Complaint.

5 **RESPONSE TO PARAGRAPH NO. 494:**

6 Defendants deny the allegations in Paragraph 494 of the Complaint.

7 **RESPONSE TO PARAGRAPH NO. 495:**

8 Defendants are without knowledge or information sufficient to form a belief as to the truth of the  
9 allegations in Paragraph 495 of the Complaint and therefore deny the same.

10 **RESPONSE TO PARAGRAPH NO. 496:**

11 Defendants deny the allegations in Paragraph 496 of the Complaint.

12 **RESPONSE TO PARAGRAPH NO. 497:**

13 Defendants deny the allegations in Paragraph 497 of the Complaint and its subparts.

14 **RESPONSE TO PARAGRAPH NO. 498:**

15 Defendants deny the allegations in Paragraph 498 of the Complaint.

16 **RESPONSE TO PARAGRAPH NO. 499:**

17 Defendants deny the allegations in Paragraph 499 of the Complaint.

18 **RESPONSE TO PARAGRAPH NO. 500:**

19 Defendants deny the allegations in Paragraph 500 of the Complaint.

20 **RESPONSE TO PARAGRAPH NO. 501:**

21 Defendants deny the allegations in Paragraph 501 of the Complaint.

22 **RESPONSE TO PARAGRAPH NO. 502:**

23 Defendants deny the allegations in Paragraph 502 of the Complaint.

24 **RESPONSE TO PARAGRAPH NO. 503:**

25 Defendants deny the allegations in Paragraph 503 of the Complaint.

26 **RESPONSE TO PARAGRAPH NO. 504:**

27 Defendants deny the allegations in Paragraph 504 of the Complaint.

28 **Response to “3. Products Liability Acts”**

**RESPONSE TO PARAGRAPH NO. 505:**

Defendants deny that Plaintiffs are entitled to relief under any state product liability statutes.

**Response to “I. Unfair Competition Law (Cal. Bus. & Prof. Code §v 17200 et seq.)”**

**RESPONSE TO PARAGRAPH NO. 506:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 506 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 507:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 507 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 508:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 508 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 509:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 509 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 510:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 510 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 511:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 511 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 512:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 512 of the Complaint accordingly does not require a response.

**RESPONSE TO PARAGRAPH NO. 513:**

Plaintiffs’ claims under California’s Unfair Competition Law have been dismissed. (*See* PTO 17 at 48-52.) Paragraph 513 of the Complaint accordingly does not require a response.

**AFFIRMATIVE & OTHER DEFENSES**

1. *Statute of limitations.* Plaintiffs' claims arose at the time they sustained their purported injuries and are stale under the applicable statutes of limitations.
2. *Intervening/superseding criminal act.* The damages of which Plaintiffs complain were proximately caused or contributed to by the criminal acts of other persons (i.e., the drivers).
3. *Failure to join indispensable parties.* Plaintiffs' claims are barred by their failure to join parties who are necessary and indispensable, including the drivers who allegedly committed the acts giving rise to their lawsuits.
4. *Good faith.* Uber acted in good faith, dealt fairly with Plaintiffs, and gave adequate warnings to Plaintiffs with regard to all known or reasonably knowable risks associated with the use of the Uber service.
5. *Independent contractor.* Plaintiffs' claims are barred, in whole or in part, under the independent contractor defense, as the drivers alleged to have committed the acts giving rise to these lawsuits were independently responsible for their own means, methods, and actions.
6. *Apportionment of fault/comparative fault.* Any alleged damages awarded to Plaintiffs must be apportioned according to the respective fault of the parties, persons and entities who contributed to Plaintiffs' supposed losses or injuries.
7. *Consent/assumption of risk.* Plaintiffs consented to the use of the Uber service knowing the nature and potential risks surrounding that service.
8. *Offset/failure to mitigate damages.* Plaintiffs are not entitled to recover any damages due to their own failure to take reasonable efforts to mitigate the amount of those damages. And to the extent they have mitigated their damages, the costs incurred by Plaintiffs were (or will be) borne, in whole or in part, from collateral sources, including through insurance.
9. *Joint and several liability.* Any liability for any non-economic damages awarded to Plaintiffs must be limited by California Civil Code § 1431.2, which limits Uber's responsibility to its proportionate share of those damages.

10. *Prior release/limitation of liability and damages (Terms of Use)*. Plaintiffs' claims are barred by a prior release of all claims pursuant to Uber's Terms of Use, which disclaim any liability or damages resulting from the actions of third-party drivers.

**JURY TRIAL DEMANDED**

Defendants hereby demand a trial by jury on all issues so triable.

11. *Abstention*. The Court should abstain from adjudicating Plaintiffs' claims in deference to the limitations provided by California Public Utilities Code Section 1759.

DATED: August 5, 2025

Respectfully submitted,

/s/ Laura Vartain Horn

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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, And RASIER-CA, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Laura Vartain Horn

Laura Vartain Horn